

Exhibit A

**IN THE TWENTY-FIRST JUDICIAL CIRCUIT COURT
ST. LOUIS COUNTY, MISSOURI**

TAMIA BANKS, et al.,

Plaintiffs,

v.

COTTER CORPORATION (N.S.L.), et al.,

Defendants.

Case No. 18SL-CC00617-01
Division No. 17

COTTER CORPORATION (N.S.L.),

Third-Party Plaintiff,

v.

MALLINCKRODT LLC, EVERZINC USA
INC., BRIDGETON LANDFILL, LLC,
REPUBLIC SERVICES, INC., ALLIED
SERVICES, LLC, WESTLAKE LANDFILL,
INC., and ROCK ROAD INDUSTRIES, INC.,

Third-Party Defendants.

NOTICE OF CONSENT TO REMOVAL

Defendants Cotter Corporation (N.S.L.) and Commonwealth Edison Company, by their counsel without waiver of jurisdictional or other defenses, consent to the removal of the action to the United States District Court for the Eastern District of Missouri pursuant to the Notice of Removal filed by Mallinckrodt LLC.

Dated: September 9, 2020

Respectfully submitted,

/s/ Brian O. Watson

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**ATTORNEYS FOR DEFENDANTS COTTER
CORPORATION (N.S.L.) AND
COMMONWEALTH EDISON COMPANY**

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

TAMIA BANKS, et al.,)	
)	
Plaintiffs,)	
)	Cause No. 18SL-CC00617-01
v.)	Division 17
)	
COTTER CORPORATION, N.S.L. et al.,)	
)	
Defendants,)	
)	
COTTER CORPORATION, N.S.L.,)	
)	
Third-Party Plaintiff,)	
)	
v.)	
)	
MALLINCKRODT LLC, et al.,)	
)	
Third -Party Defendants.)	

EVERZINC USA INC.'S NOTICE OF CONSENT TO REMOVAL

COMES NOW EverZinc USA Inc. ("EverZinc"), by and through its undersigned counsel, and hereby consents to the removal of the action to the United States District Court for the Eastern District of Missouri pursuant to the Notice of Removal filed by Mallinckrodt LLC.

Dated: September 9, 2020

Respectfully submitted,

GREENSFELDER, HEMKER & GALE, P.C.

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Counsel for EverZinc USA Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TAMIA BANKS, et al.,

Plaintiffs,

v.

COTTER CORPORATION,
COMMONWEALTH EDISON COMPANY, DJR
HOLDINGS, INC. f/k/a FUTURA COATINGS,
INC., AND ST. LOUIS AIRPORT
AUTHORITY, A DEPARTMENT OF THE
CITY OF ST. LOUIS

Defendants.

Civil Action No.

COTTER CORPORATION (N.S.L),

Third-Party Plaintiff

v.

MALLINCKRODT LLC, EVERZINC USA INC.,
BRIDGETON LANDFILL, LLC, REPUBLIC
SERVICES, LLC, ALLIED SERVICES, LLC,
WESTLAKE LANDFILL, INC., and ROCK
ROAD INDUSTRIES, INC.,

Third-Party Defendants

CONSENT TO REMOVAL

Third-Party Defendants Bridgeton Landfill LLC (on its own behalf and as the merger successor of West Lake Landfill, Inc. and the merger successor of Rock Road Industries, Inc.); Republic Services, Inc.; and Allied Services, LLC hereby consent to the removal of this matter from the Circuit Court of Saint Louis County, Missouri (Circuit Court Case No. 18SL-

CC00617-01) to the United States District Court for the Eastern District of Missouri, Eastern Division.

Dated this 9th day of September, 2020.

Lathrop GPM LLP

/s/ William G. Beck

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Attorneys for Defendants Bridgeton

Landfill LLC; Republic Services, Inc.; and

Allied Services, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TAMIA BANKS, et al.,

Plaintiffs,

v.

COTTER CORPORATION,
COMMONWEALTH EDISON COMPANY, DJR
HOLDINGS, INC. f/k/a FUTURA COATINGS,
INC., AND ST. LOUIS AIRPORT
AUTHORITY, A DEPARTMENT OF THE
CITY OF ST. LOUIS

Defendants.

Civil Action No.

COTTER CORPORATION (N.S.L.),

Third-Party Plaintiff

v.

MALLINCKRODT LLC, EVERZINC USA INC.,
BRIDGETON LANDFILL, LLC, REPUBLIC
SERVICES, LLC, ALLIED SERVICES, LLC,
WESTLAKE LANDFILL, INC., and ROCK
ROAD INDUSTRIES, INC.,

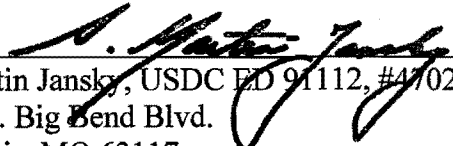
Third-Party Defendants

CONSENT TO REMOVAL

Defendant DJR Holdings, Inc. f/k/a Futura Coatings, Inc. hereby consents to the removal of this matter from the Circuit Court of Saint Louis County, Missouri (Circuit Court Case No. 18SL-CC00617-01) to the United States District Court for the Eastern District of Missouri, Eastern Division.

Dated this 9th day of September, 2020.

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TAMIA BANKS, et al.,

Plaintiffs,

v.

COTTER CORPORATION,
COMMONWEALTH EDISON COMPANY, DJR
HOLDINGS, INC. f/k/a FUTURA COATINGS,
INC., AND ST. LOUIS AIRPORT
AUTHORITY, A DEPARTMENT OF THE
CITY OF ST. LOUIS

Defendants.

Civil Action No.

COTTER CORPORATION (N.S.L),

Third-Party Plaintiff

v.

MALLINCKRODT LLC, EVERZINC USA INC.,
BRIDGETON LANDFILL, LLC, REPUBLIC
SERVICES, LLC, ALLIED SERVICES, LLC,
WESTLAKE LANDFILL, INC., and ROCK
ROAD INDUSTRIES, INC.,

Third-Party Defendants

CONSENT TO REMOVAL

Defendant City of St. Louis (the owner and operator of St. Louis Lambert International Airport®) hereby consents to the removal of this matter from the Circuit Court of Saint Louis County, Missouri (Circuit Court Case No. 18SL-CC00617-01) to the United States District Court for the Eastern District of Missouri, Eastern Division.

Dated this 9th day of September, 2020.

ARMSTRONG TEASDALE, LLP

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